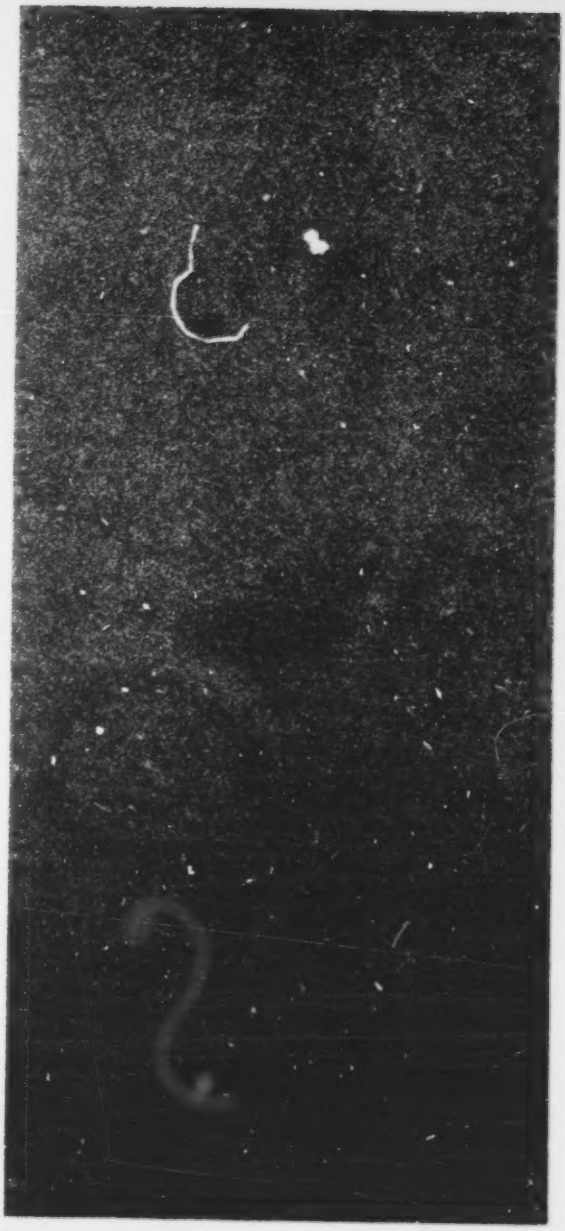
Alberta Gaming Commission



85-5798/

Alberta
GAMING COMMISSION

Chairman

1003 Energy Square, 10109 - 106 Street, Edmonton, Alberta, Canada T5J 1H3 403/427-9796

The Honourable Neil Crawford, Q.C.
Attorney General

Dear Mr. Crawford:

I am pleased to present the Alberta Gaming Commission's Annual Review for the year ending December 31, 1983.

Respectfully,

D. I. Gardner
Chairman

ROLE

The Alberta Gaming Commission, pursuant to Order In Council 124/81, is specified as the provincial authority for licencing charitable and religious organizations to conduct and manage bingos, casinos, raffles, and pull-ticket sales in accordance with section 190 (1), (c), (d), (e), and (2) of the Criminal Code (see Appendix A). The Commission is charged with the responsibility to:

1. Conduct licencing in a fair and equitable manner and, through its established hearing process, resolve all issues related to a licence application or an organization's compliance with terms and conditions of licence (see Appendix B);

2. Provide the public with information concerning the licencing and the conduct and management of gaming events; and

3. Review policies related to the licencing, conduct, and management of gaming events on a continuing basis.

The Gaming Control Branch of the Attorney General's Department assists the Commission in its role by reviewing and making recommendations concerning applications and also provides technical and professional gaming advice. The Branch is responsible for enforcing terms and conditions of gaming licences and audits required financial reports — functions essential to the effective control of gaming activities.

MEMBERSHIP

Donald I. Gardner - Chairman

Robert J. Giesbrecht - Lethbridge

Oliver R. Hoare - Edmonton

Murray L. Jacques - Calgary

Eric F. Jerrard - Grande Prairie

Ron G. Steele - Stony Plain

Michael A. Wedekind - Calgary

TABLE OF CONTENTS

REVIEW OF 1983

General 1
Bingo 1
Casino Gaming 2
Raffles 2
Pull-Tickets 2
Gaming Statistics Highlights 2
Selected Commission Cases 3

APPENDICES

A. Criminal Code 11
B. Licencing Policy Guidelines 13
C. Hearing Summary 15
D. Gaming Statistics 17

REVIEW OF 1983

GENERAL

During 1983, approximately 6100 applications for licence were received, compared to 5200 in 1982. Subsequent to the licence review process, 5826 licences were issued - a 16.8% increase over 1982. The annual total gross revenue grew to $244.5 million, an increase of 10.5%. From this gross, Alberta's charitable and religious organizations realized $46.3 million in profit, an increase of 5.3% over the previous year.

The number of hearings before the Commission increased from 113 in 1982 to 142 (see page 3 for selected cases). During the course of the year, the Commission observed a few significant developments: more organizations applied for their first licence; an increase in the number of organizations applying for more than one licence; with the involvement of the volunteer charitable community with gaming over many years, a growing awareness of gaming activity as a revenue source among other non-profit organizations; many commercial interests involved in providing supplies, services, and facilities have been actively promoting more gaming events. Underlying these developments, and perhaps a motivating force behind them, were the economic conditions of 1983. Many organizations experienced increased difficulties in trying to maintain previous levels of service to their community. Those involved in the development or operation of community facilities found expenses growing at an unexpected rate.

Over the past years, within the limits set by government policy, gaming has undergone what could be termed "regular" growth so that as earning capacity and disposable income in the province grew, so also did gross gaming revenue. Thus gaming expanded in step with economic growth in the community-at-large.

However, the pressure of economic circumstances led many organizations to look for ways of increasing their revenue through gaming activities. The cumulative effect of this was an acceleration in the rate of growth in gaming and also increased competition between community organizations. Organizations also developed proposals for new types of gaming events or scaled-up versions of types currently licenced.

The Commission believes that charitable and religious organizations should be able to enter or leave the market on their own initiative and participate in that market with a reasonable degree of flexibility and freedom. The Commission endeavours, in keeping with Criminal Code provisions and government policy, to provide opportunities for eligible organizations to raise funds for their community work through effectively controlled gaming activities, while ensuring that the principle elements of charitable gaming are maintained.

Bingo

Licenced gaming statistics are gathered according to the termination date of a licence. Therefore in bingo, where most licences are issued annually, the following statistics are somewhat understated since the final accounting of a number of new bingo operations started in 1983 will not be reported until 1984. During the year, 1536 licences were issued, an increase of 10.4%. Total gross revenue grew to $54.3 million and net profits to $10.9 million — a rate of 14.3% and 2.2%, respectively.

During the year, there was a significant increase in the number of halls used expressly for the purpose of conducting bingo. There were indications that this trend would continue into 1984. The Commission also received proposals regarding the conduct of so-called "super bingos" — occasional events with substantial cash prizes. In light of the significance of these developments, the Commission undertook a number of initiatives.

In the case of bingo halls, a practice was established of holding hearings on all such proposed facilities prior to licences being issued. Additionally, to ensure that bingo in such facilities be conducted by the volunteer charitable organizations in accordance with licence provisions, the Commission required that organizations proposing to operate in these facilities form an association to co-ordinate the bingo activities of licencees and act as a negotiating agent with landlords and other commercial interests. Ten such hearings were held during the year.

On the basis of these, the Commission proceeded to develop changes to terms and conditions of licence tailored specifically to the particular requirements of these on-going operations. These will be implemented following a review with the organizations affected. During each hearing, representatives of the individual community organizations made it clear that these new facilities were providing an opportunity for many more organizations to participate in bingo, which because of a shortage of available space, had not previously been the case. At the same time, it was apparent that the bingo market was beginning to change by appealing to a wider variety of player.

With regard to "super bingo," since all proposals were received in the latter part of the year, the Commission was able to consider the issue in light of the developments in bingo halls. Subsequent to a hearing with one of the original applicants and considerable deliberation over the issue, the Commission concluded that to allow a further increase in the scale of bingo, considering the changing bingo market conditions in both Calgary and Edmonton, would not be beneficial to the charitable or religious community as a whole.

Although some concern was expressed, particularly in Calgary, regarding the increasing number of bingo halls, the Commission believes that eligible organizations should have bingo opportunities available to them. However, those opportunities should be at a scale which is not so large as to distort the normal market forces in the community, which when operating within the Commission's broad guidelines, will create the most practical system of bingo programming. This in turn, will result in an equitable sharing of the market amongst charitable and religious organizations in the community.

Casino Gaming

Five hundred and forty-four casino licences were issued in 1983, an increase of 12.6% over 1982. Total gross revenue was $87.1 million, while the net profit was $10.6 million, representing growth rates of 9.3% and 2.2%, respectively. While gross revenue increased by 10% in Edmonton and 4.5% in Calgary, it rose by 50.6% in other areas of the province. This increase is attributable to a substantial increase in the number of casinos held in Sherwood Park and St. Albert. In all areas, the rate of increase in expenses was greater than revenue growth, thus accounting for the small increase in net profit. Since casinos are labor-intensive, these increases would seem to reflect higher wage costs for dealers, games' supervisory staff, and advisors. Part of this increase resulted from longer hours of operation.

In July, the Commission issued revised terms and conditions of casino licence for regular public casinos. These revisions were designed to explain more clearly, for both operating and training purposes, the financial control system and rules-of-play. The changes were implemented following an extensive review with registered games' managers, advisors, and volunteer representatives. This document represents a significant effort to further standardize casino practice throughout the province and to provide better controls and protection for both the licencee and the playing public.

Raffles

The number of raffle licences issued rose to 3277 from 2735, an increase of 19.8%. Gross revenue grew to $17 million, a 16.7% increase while net profit was $7.5 million, an increase of 9.9%.

Large prize-value raffles, some with $50 and $100 ticket prices were a significant feature in 1983. During the course of the year, the Commission noted that a number of organizations experienced difficulties in marketing tickets, requiring draw date extensions and, in a few instances, resulting in financial loss to the organizations. In response to these developments, the Commission implemented a practice of conducting a hearing prior to licencing raffles of this type. This provided an opportunity for organizations to review with the Commission marketing plans and their financial ability to fund the costs of prizes and expenses of the raffle. Subsequently, the Commission established a special term and condition for all such licences that gaming revenue could not be expended until there were sufficient funds available to guarantee the awarding of all prizes offered.

Pull-Tickets

Four hundred and sixty-nine pull-ticket licences were issued in the year, an increase of 24.4%. Gross revenue grew to $85.9 million, an 8.3% increase, while net profits increased to $17.2 million, which is 7.3% above the 1982 figure.

A number of organizations have proposed that pull-ticket sales be permitted in a variety of commercial and other locations, which would significantly increase the market area for this type of lottery scheme. The Commission has maintained that its policy of limiting pull-ticket sales to the licencee's own facility, accessible principally to members and guests, is the most effective way of maintaining financial control and operational accountability. Any other approach, in the Commission's view, would lead to a situation where proper supervision and control would be extremely difficult to maintain.

GAMING STATISTICS HIGHLIGHTS

The gaming statistics for 1983 are included in Appendix D. Below are some highlights.

Locations	Total Gross	Net
Edmonton	$ 83,108,700	$ 15,089,600
Calgary	85,744,400	13,837,600
Ft. McMurray	3,873,600	728,300
Grande Prairie	2.305,900	528,200
Lethbridge	9,840,100	1,822,900
Medicine Hat	6,317,200	1,253,600
Red Deer	4,570,300	1.044,600
All Others	48,801,000	12,052,100
Totals	$244,561,200	$ 46,356,900

SELECTED COMMISSION CASES

Issue: Charitable Status of Organization

Case: 83-5

Background
A society organized to operate an educational centre which develops and evaluates new educational programs and does research on treatment of the learning disabled, applied for licence. Appointment to the Board of Directors was restricted to nominees from nine public agencies and one major service club. Staff of the centre were paid professionals.

Decision
Given that each member of the board held that position as part of their professional duties in the public agency which nominated them, and given that no significant element of volunteer community efforts existed in the society, this organization was deemed not eligible for a licence.

Issue: Use of Gaming Proceeds for Lobbying Purposes

Case: 83-19

Background
An outdoor recreation and conservation organization proposed to use the proceeds of a raffle to assist efforts aimed at defeating approval of a dam project.

Decision
Gaming proceeds can be used only for charitable or religious purposes. Lobbying activities related to government policies or programs at any level of government are not considered to be a charitable objective or purpose and therefore not an approved use of gaming proceeds.

Issue: Charitable Status of Organization

Case: 83-21

Background
A curling club with a shareholder structure, organized under the Companies Act on a non-profit basis, applied for a pull-ticket licence.

Decision
Given that the club was organized on a non-profit basis with no financial benefits accruing to the shareholders, that its recreational facilities are easily accessible to a broad segment of the general public and that the local municipal government owns the land, the club was deemed eligible for a licence.

Issue: Charitable Status of Organizatic .

Case: 83-24

Background
A golf and curling club with a shareholder structure, organized under the Companies Act on a non-profit basis, applied for a pull-ticket licence.

Decision
Although organized on a non-profit basis, the club conducted its business in the manner and style of a private club serving the self-interest of its membership, as opposed to being organized to serve a broad public interest. As such, it was not eligible for a licence.

Issue: Suitable Premises for Sale of Pull-Tickets

Case: 83-25

Background
A major agricultural exhibition applied to sell pull-tickets at their licenced casino held during the annual fair.

Decision
The sale of pull-tickets within casinos has not been approved in the past. This proposal would represent a major departure from current policy and establish a precedent, the result of which would allow the proliferation of pull-ticket sales under conditions and in a manner which is not acceptable from the standpoint of financial control and accountability.

Issue: Suitability of Sale Arrangements for Pull-Tickets

Case: 83-27

Background
A major service club proposed to sell pull-tickets in the area of its premises rented regularly by other charitable organizations to conduct bingo.

Decision
Pull-Tickets can be sold only in the premises from which an eligible organization delivers its services to the community, not in a part of the building used primarily for conducting licenced gaming events. Further, the proposed sales scheme was essentially an "umbrella" sales arrangement, permitting organizations, who would not otherwise be so licenced, to sell pull-tickets. For these reasons, the proposal was not considered a suitable arrangement for the sale of pull-tickets.

Issue: Suitability of Sale Arrangements for Pull-Tickets

Case: 83-28

Background
A volunteer support group for a major cultural facility applied for a pull-ticket licence, proposing to conduct sales through a network of shopping malls, retail stores, hotels and restaurants. Further, members of the applying organization would not be directly involved in selling. Instead, sales would be conducted by other organizations on a commission basis, with a commercial distributor involved in the handling and distribution of revenues.

Decision
Pull-tickets may be sold only on the organization's own premises to ensure that sales are restricted to areas where access is controlled by the licencee, and that sellers are properly supervised. Neither of these conditions was met in this proposal. Further, management and sales of pull-tickets by the licencee may not be delegated to another organization. As was proposed, certain of the inventory control functions and control of sales revenue were to be handled by a commercial distributor. For these reasons, the proposed sales arrangement was not considered suitable for a licence.

Issue: Charitable Status of Organization

Case: 83-37

Background
A dance company (licenced to conduct casinos in 1980, 1981, and 1982) was the subject of an audit by the Gaming Control Branch. The audit identified structural changes in the organization which, in effect, seemed to place total control in the hands of the two principal dancers. Therefore, the Branch questioned the continued eligibility of the organization for licence.

Decision
The company had reorganized its legal structure so that control of its activities was concentrated in the hands of a few individuals. To be considered charitable, the control and direction of an organization should be carried out by volunteer members of the community. This dance company was organized as a professional performing company, with little volunteer participation. On this basis, it was deemed no longer eligible.

Issue: Charitable Status of Organization

Case: 83-49

Background
An athletic organization, incorporated on a non-profit basis under the Companies Act, applied for casino licence.

Decision
This organization was a limited company with only two shareholders, each of whom was involved with an athletic club which offered instruction on a fee-for-service basis. Gaming proceeds were to be used to defray capital and operating costs of the athletic club. Since the activities of the applicant were deemed to be in the self-interest of the shareholders, as opposed to allowing volunteer control, the organization was not eligible for a licence.

Issue: Use of Proceeds

Case: 83-54

Background
An ethno-cultural organization, which operated a facility providing a variety of services and programs to both its membership and the community, applied to use 100% of its casino and raffle proceeds in support of the facility and its operation.

Decision
This organization, while providing a community benefit, also served the self-interest of its members. Gaming proceeds may be used only for charitable or religious purposes and are not to be used for the self-interests of the organization's members. Because of the mix of objectives and activities within this type of organization, Commission policy has been that only 50% of gaming proceeds may be used for expenditures relating to certain types of facilities and equipment. The remaining 50% must be used for specific, approved charitable purposes. No exception from policy was allowed in this case.

Issue: Casino Eligibility

Case: 83-61

Background
This applicant for a casino licence was made up of several organizations, all sharing a common national heritage. Two member organizations had made application for their own casinos. The applicant itself was a member of a Canada-wide body and provided a variety of services and programs to the immigrant community.

Decision
This organization's programs were designed to resolve problems common to all its members, not to serve the particular interests of specific groups. While there was a clear relationship among the various organizations, the aims and objectives of each organization were separate and distinct. The use of any casino proceeds by the applicant was not in support of objectives held in common with its related organizations. As such, it was entitled to a casino in its own right.

Issue: Charitable Status of Organization

Case: 83-64

Background
The applicant was incorporated under the Boards of Trade Act, conducting its business under the name and in the style of a chamber-of-commerce. It promoted interest in agriculture, industry, civic welfare, and public affairs while actively supporting a variety of community organizations.

Decision
The applicant was organized primarily "for the purpose of promoting and improving trade and commerce and the economic, civic and social welfare of the district." While some of its activities may benefit the entire community, it is not organized primarily for charitable purposes and so is not eligible for a licence.

Issue: Charitable Status of Organization

Case: 83-71

Background
The applicant for casino licence was an international development agency with headquarters in Ottawa and incorporated under Part II of the Canada Corporation

Act. It was composed of a number of regional executive committees, including one in Alberta comprising four local committees. The agency recruits skilled volunteers for overseas service and provides financial assistance to self-help community projects.

Decision
The organization was deemed charitable as it was organized primarily to carry out international development assistance. The regional executive committee in Alberta was the appropriate organization to conduct a casino, because it was the primary decision-making body in Alberta for the national organization. Where an organization has subsidiaries or related groups, only one of either the principal organization or any related group is eligible in any year for a casino licence. Therefore, the local committees were not eligible for casino licence. In addition, any gaming proceeds can be used only for projects that meet Commission guidelines for allowable uses of gaming proceeds; actual use of proceeds must be substantiated by out-of-country financial reporting. Since the Alberta regional executive committee is a provincial organization, it could select a geographical location to conduct the casino.

Issue: Extension to Raffle Draw Date

Case: 83-73

Background
A sports association licenced to conduct a raffle, the total prize value of which was in excess of $200,000, requested a postponement of the draw date by five months. An earlier extension to draw date had been granted because of poor ticket sales. In addition, it was learned that as a sales promotion technique, the association was selling portions of tickets on a "shared" or "syndicated" basis.

Decision
Extension was granted on the following basis:
- All previous ticket buyers were to be advised of the change in draw dates;
- Upon request, any previous ticket buyer should have the ticket price refunded. All previous ticket buyers were to be so advised.
- The draw date on all unsold tickets was to be changed.

Also, there was to be no additional marketing by the licencee on a syndicated basis.

Issue: Use of Proceeds

Case: 83-76

Background
An organization which assists learning-disabled individuals of all ages, requested the use of future gaming proceeds to support the salary of a newly established Executive Director position.

Decision
The primary duties of the Executive Director are administrative, relating to the coordination and scheduling of activities of the organization. While a professional education background may be required, the duties of this position are not integral to the delivery of services to the learning disabled. Therefore, the payment of salary of the Executive Director was not a charitable purpose and thus was not an eligible use of gaming proceeds.

Issue: Use of Proceeds

Case: 83-89

Background
A service organization, which conducted its business from rented premises, established a fund to finance its own building and applied for permission to direct portions of gaming revenue to this fund.

Decision
The proposed facility was intended primarily to deliver the charitable services of the organization and its affiliates to the community. There was no provision made for the social or recreational activities of members. As such, the building fund was an acceptable use of proceeds.

Issue: Charitable Status of Organization

Case: 83-96

Background
The applicant for casino licence was a national environmental activist organization with no formal structure in the province, but registered as an extra-provincial corporation under the Business Corporation Act.

Decision
This organization was created primarily to affect public policy by means of non-violent direct action. Lobbying to change public policy is not considered a charitable purpose or objective, and as a result, this organization was not deemed charitable in nature. As an additional but separate issue, this applicant did not have a representative organization in Alberta to conduct and manage gaming events.

Issue: Review of Large Ticket-Value Raffle Application

Case: 83-97

Background
A major service club applied to conduct a raffle with a total prize value of $259,300; individual tickets to be priced at $100. Given the size of the raffle and the price per ticket, the Commission chose to review with the organization its detailed plans regarding the management and conduct of the raffle.

Decision
The organization demonstrated that an adequate marketing plan was in place to sell tickets and that it had sufficient financial resources available to guarantee the awarding of prizes. No revenue from ticket sales was to be spent on raffle expenses, prize costs or approved objectives until sufficient funds were available to guarantee awarding the prizes.

Issue: Use of Proceeds

Case: 83-101

Background
A veterans' organization was licenced to sell pull-tickets on its premises, subject to the Commission policy of limiting this type of organization to the use of only 50% of gaming revenue for its building fund. Following an audit of the pull-ticket accounts by the Gaming Control Branch, it was established that the organization had for sometime used in excess of 50% for the building fund. The organization subsequently requested permission for 60% of remaining gaming revenues to be used for the building, citing a continued history of operating losses.

Decision
The organization could use only 25% of its pull-ticket proceeds for its building fund. The balance was to be used for other approved charitable or religious purposes. This was to remain in place until such time that the total funds diverted from charitable or religious purposes had been reimbursed. Once this was accomplished, 50% of proceeds could again be used for the building fund.

Issue: Review of Media Bingo Proposal

Case: 83-111

Background
An organization dedicated to the development of a major health care facility proposed to conduct a television bingo with an estimated gross revenue of $1,500,000. The scheme was a "package," proposed by a commercial firm, which included substantial involvement in conduct and management by the commercial interests.

Decision
The Commission licences only charitable or religious organizations to conduct and manage gaming events, including bingo. While the applicant was a charitable organization, it would not be primarily responsible for conducting and managing the proposed television bingo. Rather, a commercial organization would effectively conduct and manage the bingo, including arranging for printing and distribution of cards, collecting revenue from the sale of cards, developing computer software programs to determine winners, and organizing the bingo games. The role of the applicant appeared to be limited to that of a monitor. It would receive any profits from the event remaining after substantial expenses and commission had been deducted from gross revenue. The Commission wished to ensure that commercial involvement and profit from gaming activities be limited, with maximum effort and involvement by volunteer members so that gaming revenues accrued substantially to licenced organizations for their community charitable activities. For these reasons, the proposed television bingo was not licenced.

Issue: Use of Proceeds

Case: 83-112

Background
An ethno-cultural club, licenced to sell pull-tickets at its club facilities, expended in excess of 50% of gaming revenue for its building fund, contrary to licence terms and conditions. Subsequently, it requested Commission permission to continue to commit in excess of 50% of gaming revenue to the building fund.

Decision
The licencee could use only 35% of net pull-ticket revenue for the building fund. The remaining 65% of net revenue would remain in the pull-ticket account, for disbursement only after Commission approval of specific objectives. When a facility, such as the one operated by the licencee, is used for a mix of community benefit and membership self-interest, Commission policy is that the organization can use only 50% of gaming proceeds for facility capital or operating costs. For two years, the licencee substantially exceeded this limit. Until the funds expended in excess of 50% limit are refunded to the pull-ticket account, the club was restricted to using 35% of net pull-ticket revenue for its building fund.

Issue: Review of Large Prize Bingo Proposal

Case: 83-113

Background
A fraternal organization, which supports a major health care facility for children, proposed to conduct occasional bingos with a prize payout of $150,000 per event in a facility with a large seating capacity. Other similar proposals were pending Commission decision on this case.

Decision
This proposal, together with other similar schemes, was planned for Calgary and Edmonton. At the time within each city, intense competition among various bingo operations was developing. In part, this was a result of the increasing number of facilities being used by community organizations to conduct bingo on an on-going basis. The proposals under review would represent a significant change from the types of bingo now licenced and have a detrimental effect on present operations. Therefore, the Commission did not approve the proposed schemes.

Issue: Charitable Status of Organization

Case: 83-121

Background
A society formed to co-ordinate celebration activities associated with the championship game of a professional sport applied for casino licence.

Decision
The society was not a charitable organization and therefore, not eligible for casino licence. Promotions of a social nature designed to enhance tourist and commercial activities in conjunction with a professional sporting event are not considered charitable.

Issue: Location of Proposed Bingo

Case: 82-123

Background
An organization, currently licenced to conduct bingo in the City of Edmonton, made application to also conduct bingo in Sherwood Park. The organization was formed to ensure availability of adequate housing for semi-dependent, physically handicapped adults in Edmonton and operated a facility in that city.

Decision
Organizations are eligible to conduct bingos only in their own city, town, or community. At the time, the applicant offered a service essentially in Edmonton only. It had no real presence in Sherwood Park or the County of Strathcona. Therefore, it was not eligible to conduct bingo in Sherwood Park.

Issue: Use of Proceeds

Case: 83-130

Background

An organization, which had conducted a major raffle that lost in excess of $40,000, applied to the Commission to use the proceeds of a future casino to offset the raffle loss.

Decision
Gaming proceeds can be used only for charitable or religious purposes. Use of casino proceeds to offset a loss from a raffle was not considered a charitable purpose.

Issue: Review of Proposed Televised Lottery Scheme

Case: 83-131

Background
A major service club proposed to conduct a lottery scheme involving $24,000 in prize money. The scheme involved the weekly sale of 100,000 tickets followed by a weekly telecast of pre-recorded horse races. The numbers of the winning horses corresponded to numbers pre-printed on the lottery tickets. The lottery tickets came as a standard unit of 100,000 with a set number of winning tickets ranging in value from $2 to $1000.

Decision
The Commission limits its licencing to four types of lottery schemes - bingo, casino, raffle and pull-ticket. This scheme did not fall into any of those categories. The marketing plan had significant commercial aspects. In addition, questions relating to ticket security, distribution, and inventory, plus overall financial control raised doubts about the on-going role of the applicant in assuming full responsibility for the conduct and management of the event. Establishing a precedent by licencing this type of scheme could have led to consideration of many other types of gaming schemes and affected the level of gaming activity. On this basis the proposal was not approved.

Issue: Charitable Status of Organization

Case: 83-134

Background
An association, formed to co-ordinate bingo activities on behalf of its members, applied to conduct bingo in its own right.

Decision
The association is not a charitable organization since it exists only as a management organization for co-ordinating bingo activities. A licence was not granted.

Issue: Review of Proposed Bingo Program

Case: 83-141

Background
An association, formed to co-ordinate bingo activities on behalf of its members, made submission to the Commission for its members to be granted permission to conduct a progressive bonanza as part of the regular bingo program.

Decision
Where a number of licencees rent a hall to conduct bingo regularly, licencees cannot conduct any type of bingo game offering a prize structure which may accumulate over more than one event. Such a program is difficult to implement and effectively control in these halls.

Appendices

APPENDIX A

Excerpts* from Criminal Code of Canada
Part V, Section 190

190(1) Notwithstanding any of the provisions of this Part relating to gaming and betting, it is lawful

... (c) for a charitable or religious organization, under the authority of a licence issued by the Lieutenant Governor in Council of a province or by such other person or authority in the province as may be specified by the Lieutenant Governor in Council thereof, to conduct and manage a lottery scheme in that province and for that purpose for any person under the authority of such licence to do any thing described in any of paragraphs 189(1)(a) to (g) or subsection 189(4), otherwise that in relation to a dice game, three-card monte, punch board or coin table, if

(i) the proceeds from the lottery scheme are used for a charitable or religious object or purpose, and
(ii) in the case of a lottery scheme conducted by the charitable or religious organization at a bazaar,

(A) the amount or value of each prize awarded does not exceed one hundred dollars, and
(B) the money or other valuable consideration paid to secure a chance to win a prize does not exceed fifty cents;

(d) for an agricultural fair or exhibition or an operator of a concession leased by an agricultural fair or exhibition board, under the authority of a licence issued by the Lieutenant Governor in Council of a province or by such other person or authority in the province as may be specified by the Lieutenant Governor in Council thereof, to conduct and manage a lottery scheme in that province and for that purpose for any person under the authority of such licence to do any thing described in any of paragraphs 189(1)(a) to (f) or subsection 189(4);

(e) for any person, under the authority of a licence issued by the Lieutenant Governor in Council of a province or by such other person or authority in the province as may be specified by the Lieutenant Governor in Council thereof, to conduct and manage a lottery scheme at a public place of amusement in that province and for that purpose for any person under the authority of such licence to do any thing described in any of paragraphs 189(1)(a) to (g) or subsection 189(4), otherwise than in relation to a dice game, three-card monte, punch board or coin table, if

(i) the amount or value of each prize awarded does not exceed one hundred dollars, and
(ii) the money or other valuable consideration paid to secure a chance to win a prize does not exceed fifty cents; and ....

(2) Subject to this Act, a licence issued by or under the authority of the Lieutenant Governor in Council of a province as described in paragraph (1)(c), (d) or (e) or subsection (1.1) may contain such terms and conditions relating to the conduct and management of the lottery scheme to which the licence relates as the Lieutenant Governor in Council of that province or the person or authority in the province designated by him may prescribe....

(5) In this section "lottery scheme" includes a game.

*Defining the authority of the Alberta Gaming Commission for the licencing of lottery schemes in the Province of Alberta.

APPENDIX B

Alberta Gaming Commission
Licencing Policy Guideline
(The Alberta Gazette, May 15, 1981)

1(1) In this guideline

(a) "Commission" means the Alberta Gaming Commission;
(b) "fair" means an agricultural fair or exhibition;
(c) "Gaming Control Branch" means the Gaming Control Branch of the Department of the Attorney General;
(d) "lottery scheme" includes bingos, raffles, pull-ticket lotteries and casino games;
(e) "organization" means a charitable or religious organization;
(f) "prescribed" means prescribed by the Commission.

(2) An organization or fair wishing to conduct a lottery scheme shall submit an Application in the prescribed form to the Commission.

(3) The Commission shall forward the Application to the Gaming Control Branch and an employee in the Gaming Control Branch designated by the Chief Inspector of the Branch shall, on receipt of the Application, review the Application, and, if he considers it necessary, conduct an investigation regarding the advisability of issuing a Licence and make a recommendation and report in that regard to the Commission.

(4) The Commission, on receiving a recommendation and report and on reviewing the Application shall

(a) issue the Licence, and may make the Licence subject to any terms and conditions it considers appropriate, or
(b) if it appears to the Commission that there is cause for concern as to whether a Licence should be issued, set a date for a hearing on the matter.

(5) The Commission may, before acting under subsection (4), request other information from the Gaming Control Branch and the applicant.

(6) The Commission shall give notice in writing of the hearing to the Gaming Control Branch and the applicant, and the notice shall

(a) set out with sufficient clarity the basis on which the Commission feels there is cause for concern as to whether the applicant should be issued a Licence, and
(b) set out the time and place for the hearing.

(7) Notice of the hearing shall be served on the applicant and the Gaming Control Branch either personally or by certified mail addressed to the applicant or the Gaming Control Branch at the address shown on the Application.

(8) At the hearing the employee in the Gaming Control Branch referred to in subsection (3) and the applicant are entitled to

(a) be present,
(b) make representations in respect of the Application orally and in writing, and
(c) be represented by counsel.

(9) A hearing shall be open to the public unless the Commission feels that it is advisable that all or part of the hearing be held in camera, in which case it may so direct.

(10) After considering the representations of the parties and any other evidence it considers appropriate the Commission shall

(a) issue the Licence, and may make the Licence subject to any terms and conditions it considers appropriate, or (b) refuse to issue the Licence.

(11) If the Commission refuses to issue the Licence it shall give written reasons for doing so and serve those reasons on the applicant and the Gaming Control Branch in the manner provided in subsection (7).

(12) A Licence issued by the Commission is subject to the terms and conditions on it or attached to and forming part of it, and to any further terms and conditions made by the Commission from time to time.

2(1) No licence fee is payable in respect of a Bingo Licence or a Raffle Licence.

(2) The licence fee payable in respect of

(a) a Pull Ticket Licence is an amount equal to one per cent of the product of the estimated number of units times the gross revenue per unit,
(b) a Casino Licence issued to an organization is an amount equal to the product of $10 times the number of games times the number of days the Casino operates, and
(c) a Casino Licence issued to a fair is an amount equal to the product of $25 times the number of games times the number of days the Casino operates.

APPENDIX C

Hearings Summary

I.	**Number of Commission Meetings:**		**1981**	**1982**	**1983**
	Hearing Days		20	24	26
	Policy Planning Meetings		7	2	4
		Total	27	26	30
II.	**Case-Load for Public Hearings:**				
	Decisions		128	113	131
	Applications Withdrawn		N/A	N/A	2
	Deferred Decisions		N/A	N/A	9
		Total			142
	Total number of cases reviewed*		128	113	140
	Types of Issues:				
	Charitable status of organizations		69	64	71
	Suitable use of proceeds		20	42	27
	Eligibility for casino licence		28	5	12
	Issues related to terms and conditions of licence		10	18	21
	Review of large ticket-value raffles		-	-	5
	Review of proposed bingo associations		-	-	10
	Issues related to registration status, casino personnel		6	3	4

* *Not equal to sum of issues, as each case may involve more than one issue.*

III. Decisions Following Public Hearing:

	Approved			Not Approved			Total		
	1981	**1982**	**1983**	**1981**	**1982**	**1983**	**1981**	**1982**	**1983**
Licences									
Bingo	4	21	172	5	13	15	9	34	187
Casino	43	29	25	24	17	18	67	46	43
Raffle	16	17	27	20	17	17	36	34	44
Pull-Ticket	3	7	4	2	25	7	5	32	11
	66	74	228	51	72	57	117	146	285
Policy Issues	1	1	1	4	1	0	5	2	1
Casino Staff Registration	3	2	1	3	1	3	6	3	4
Total	70	77	230	58	74	60	128	151	290

APPENDIX D

Gaming Statistics

(Compiled by Audit Section, Gaming Control Branch, Department of the Attorney General)

TABLE 1

TOTALS OF ALL LICENCED GAMING 1981 - 1983

1981										
Bingo	1 299	27 042	---	40 255 780 00	27 019 223 00	67 1	3 315 511 00	8 2	9 921 046 00	24 7
Casino	476	941	305 110 00	76 342 675 00	58 901 321 00	77 1	6 760 835 00	8 9	10 680 519 00	14 0
Raffle	2 506	5 711	21 950 00	10 807 332 00	4 155 310 00	38 5	1 451 162 00	13 4	5 200 860 00	48 1
Pull-Ticket	347	347	720 133 30	68 185 461 00	50 331 582 00	73 8	3 993 214 00	5 9	13 860 665 00	20 3
TOTAL	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	**71 0**	[illegible]	**7 9**	[illegible]	**29 3**
1982										
Bingo	1 391	29 933	---	47 502 004 00	32 411 879 00	68 2	4 370 218 00	9 2	10 719 907 00	22 6
Casino	483	961	308 200 00	79 727 496 00	61 843 534 00	77 6	7 446 985 00	9 3	10 436 977 00	13 1
Raffle	2 735	6 838	24 550 00	14 677 187 00	6 062 832 00	41 3	1 745 431 00	11 9	6 868 924 00	46 8
Pull-Ticket	377	377	817 771 00	79 360 303 00	58 630 668 00	73 9	4 715 077 00	5 9	16 014 558 00	20 2
TOTAL	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	**71 8**	[illegible]	**8 3**	[illegible]	**19 9**
1983										
Bingo	1 536	32 345	---	54 310 548 00	37 941 009 00	69 8	5 415 060 00	10 0	10 954 479 00	20 2
Casino	544	1 086	330 540 00	87 168 224 00	67 751 003 00	77 7	8 754 891 00	10 1	10 662 330 00	12 2
Raffle	3 277	8 146	23 350 00	17 125 752 00	7 388 158 00	43 1	2 188 789 00	12 8	7 548 805 00	44 1
Pull-Ticket	469	469	858 261 00	85 957 080 00	63 595 823 00	74 0	5 169 899 00	6 0	17 191 358 00	20 0
TOTAL	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	**72 2**	[illegible]	**8 8**	[illegible]	**19 9**

*For bingo, this represents the number of sessions; for casinos, the number of days; for raffles, the number of draw dates; and for pull-tickets, the number of licences.

TABLE 2

LICENCED BINGO 1981 - 1983

1981										
Edmonton	316	6 156	---	22 089 128 00	14 503 577 00	65 7	1 948 854 00	8 8	5 636 697 00	25 5
Calgary	117	5 994	---	7 051 961 00	5 255 315 00	74 5	602 068 00	8 5	1 194 578 00	16 9
Others	866	14 892	---	11 114 691 00	7 260 331 00	65 3	764 589 00	6 9	3 089 771 00	27 8
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
1982										
Edmonton	386	7 489	---	25 896 476 00	17 549 826 00	67 8	2 654 218 00	10 2	5 692 432 00	22 0
Calgary	111	5 729	---	8 069 329 00	5 973 203 00	74 0	725 715 00	9 0	1 370 411 00	17 0
Others	894	16 715	---	13 536 199 00	8 888 850 00	65 7	990 285 00	7 3	3 657 064 00	27 0
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
1983										
Edmonton	398	7 838	---	27 613 210 00	19 071 433 00	69 1	3 060 598 00	11 1	5 481 179 00	19 8
Calgary	120	6 009	---	7 813 792 00	6 171 185 00	79 0	643 571 00	8 2	999 036 00	12 8
Others	1 018	18 498	---	18 883 546 00	12 696 391 00	67 2	1 710 891 00	9 1	4 474 264 00	23 7
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

TABLE 3

LICENCED CASINO 1981 - 1983

1981									
Edmonton	192	388	143 070 00	32 718 125 00	24 689 702 00	75 5	2 865 746 00	8 7	5 162 677 00	15 8
Calgary	167	340	129 300 00	39 818 728 00	31 496 790 00	79 1	3 297 293 00	8 3	5 024 645 00	12 6
Others	117	213	32 740 00	3 805 822 00	2 714 829 00	71 3	597 796 00	15 7	493 197 00	13 0
1982									
Edmonton	191	386	142 350 00	36 289 408 00	27 937 689 00	77 0	3 133 581 00	8 6	5 218 138 00	14 4
Calgary	171	348	132 230 00	39 444 490 00	31 080 445 00	78 8	3 661 489 00	9 3	4 702 556 00	11 9
Others	121	227	33 620 00	3 993 598 00	2 825 400 00	70 7	651 915 00	16 3	516 283 00	13 0
1983									
Edmonton	193	390	143 230 00	39 918 711 00	30 804 662 00	77 2	3 564 946 00	8 9	5 549 103 00	13 9
Calgary	187	381	142 100 00	41 233 183 00	32 486 057 00	78 8	4 213 022 00	10 2	4 534 104 00	11 0
Others	164	315	45 210 00	6 016 330 00	4 460 284 00	74 1	976 923 00	16 2	579 123 00	9 7

* For casinos "gross" equals "drop" - the total of money spent to purchase chips

TABLE 4

LICENCED PULL - TICKETS 1981 - 1983

1981									
Edmonton	14	97 911 34	9 549 410 00	7 138 180 00	74 7	534 445 00	5 6	1 876 785 00	19 7
Calgary	105	301 934 48	28 084 376 00	20 649 850 00	73 5	1 550 920 00	5 5	5 883 606 00	21 0
Others	228	320 287 48	30 551 675 00	22 543 552 00	73 8	1 907 849 00	6 2	6 100 274 00	20 0
1982									
Edmonton	14	108 975 00	10 734 984 00	8 028 606 00	74 8	658 540 00	6 1	2 047 838 00	19 1
Calgary	111	341 187 00	32 782 670 00	24 081 626 00	73 4	1 828 524 00	5 6	6 872 520 00	21 0
Others	252	367 609 00	35 842 649 00	26 520 436 00	74 0	2 228 013 00	6 2	7 094 200 00	19 8
1983									
Edmonton	21	114 128 00	11 603 853 00	8 662 040 00	74 6	719 024 00	6 2	2 222 789 00	19 2
Calgary	126	329 605 00	33 232 886 00	24 421 999 00	73 5	1 950 938 00	5 9	6 859 949 00	20 6
Others	322	414 528 00	41 120 341 00	30 511 784 00	74 2	2 499 937 00	6 1	8 108 620 00	19 7

TABLE 5

LICENCED RAFFLE 1981 - 1983

	[illegible]	[illegible]	[illegible]*	[illegible]	[illegible]	%	[illegible]	%	[illegible]	%
1981										
Edmonton	368	785	7 700 00	2 597 291 00	1 025 446 00	39 5	421 293 00	16 2	1 150 552 00	44 3
Calgary	244	682	10 700 00	2 832 778 00	964 285 00	34 0	486 866 00	17 2	1 381 627 00	48 8
Others	1 894	4 244	3 550 00	5 377 263 00	2 165 579 00	40 3	543 003 00	10 1	2 668 681 00	49 6
TOTAL	**[illegible]**	**[illegible]**	**[illegible]**	**[illegible]**	**[illegible]**	**[illegible]**	**[illegible]**	**[illegible]**	**[illegible]**	**[illegible]**
1982										
Edmonton	424	1 221	7 600 00	2 699 858 00	1 100 032 00	40 7	441 827 00	16 4	1 157 999 00	42 9
Calgary	272	1 153	13 000 00	3 549 762 00	1 204 882 00	33 9	535 582 00	15 1	1 809 298 00	5 i 0
Others	2 039	4 464	3 950 00	8 427 567 00	3 757 918 00	44 6	768 022 00	9 1	3 901 627 00	46 3
TOTAL	**[illegible]**	**[illegible]**	**[illegible]**	**[illegible]**	**[illegible]**	**41.3**	**[illegible]**	**11.9**	**[illegible]**	**[illegible]**
1983										
Edmonton	491	1 292	7 600 00	3 972 974 00	1 619 193 00	40 8	517 256 00	13 0	1 836 525 00	46 2
Calgary	307	1 433	10 600 00	3 464 510 00	1 373 640 00	39 6	646 394 00	18 7	1 444 476 00	41 7
Others	2 479	5 421	5 150 00	9 688 268 00	4 395 325 00	45 4	1 025 139 00	10 6	4 267 804 00	44 0
TOTAL	**[illegible]**	**[illegible]**	**[illegible]**	**[illegible]**	**[illegible]**	**43.1**	**[illegible]**	**[illegible]**	**[illegible]**	**[illegible]**

*For agricultural fairs and exhibition boards only

TABLE 6

REGIONAL BREAKDOWN ALL LICENCED GAMING 1983

Edmonton										
Bingo	398	7,838	---	27,613,210.00	19,071,433.00	69.1	3,060,598.00	11.1	5,481,179.00	19.8
Casino	193	390	143,230.00	39,918,711.00	30,804,662.00	77.2	3,564,946.00	8.9	5,549,103.00	13.9
Raffle	491	1,292	7,600.00	3,972,974.00	1,619,193.00	40.8	517,256.00	13.0	1,836,525.00	46.2
Pull-Ticket	21	21	114,128.00	11,603,853.00	8,662,040.00	74.6	719,024.00	6.2	2,222,789.00	19.2
TOTAL										
Calgary										
Bingo	120	6,009	---	7,813,792.00	6,171,185.00	79.0	643,571.00	8.2	999,036.00	12.8
Casino	187	381	142,100.00	41,233,183.00	32,486,057.00	78.8	4,213,022.00	10.2	4,534,104.00	11.0
Raffle	307	1,433	10,600.00	3,464,510.00	1,373,640.00	39.6	646,394.00	18.7	1,444,476.00	41.7
Pull-Ticket	126	126	329,605.00	33,232,886.00	24,421,999.00	73.5	1,950,938.00	5.9	6,859,949.00	20.6
TOTAL										
Ft. McMurray										
Bingo	6	279	---	1,009,844.00	725,945.00	71.9	111,098.00	11.0	172,801.00	17.1
Casino	28	58	5,520.00	1,164,296.00	825,830.00	70.9	166,355.00	14.3	172,111.00	14.8
Raffle	43	98	---	429,983.00	266,039.00	61.9	16,654.00	3.9	147,290.00	34.2
Pull-Ticket	5	5	12,715.00	1,269,480.00	969,660.00	76.4	63,676.00	5.0	236,144.00	18.6
TOTAL										
Grande Prairie										
Bingo	13	431	---	622,167.00	404,926.00	65.1	64,102.00	10.3	153,139.00	24.6
Casino	5	10	1,420.00	198,044.00	133,966.00	67.6	37,847.00	19.1	26,231.00	13.3
Raffle	40	42	500.00	238,371.00	106,564.00	44.7	34,201.00	14.4	97,606.00	40.9
Pull-Ticket	5	5	12,510.00	1,247,347.00	913,860.00	73.3	82,220.00	6.6	251,267.00	20.1
TOTAL										
Lethbridge										
Bingo	20	877	---	823,795.00	567,536.00	68.9	56,711.00	6.9	199,548.00	24.2
Casino	10	24	8,450.00	1,067,715.00	839,670.00	78.6	178,640.00	16.7	49,405.00	4.7
Raffle	56	129	450.00	393,815.00	190,768.00	48.4	42,401.00	10.8	160,646.00	40.8
Pull-Ticket	18	18	75,495.00	7,554,875.00	5,650,040.00	74.8	491,530.00	6.5	1,413,305.00	18.7
TOTAL										
Medicine Hat										
Bingo	11	676	---	547,433.00	393,940.00	72.0	51,411.00	9.4	102,082.00	18.6
Casino	12	28	6,740.00	1,033,220.00	789,789.00	76.4	160,730.00	15.6	82,701.00	8.0
Raffle	57	180	850.00	475,858.00	221,384.00	46.5	32,253.00	6.8	222,221.00	46.7
Pull-Ticket	11	11	43,002.00	4,260,801.00	3,151,480.00	74.0	262,687.00	6.2	846,634.00	19.8
TOTAL										
Red Deer										
Bingo	11	419	---	704,497.00	454,394.00	64.5	64,082.00	9.1	186,021.00	26.4
Casino	9	22	7,650.00	786,004.00	578,803.00	73.6	138,921.00	17.7	68,280.00	8.7
Raffle	55	142	---	600,262.00	251,805.00	41.9	79,625.00	13.3	268,832.00	44.8
Pull-Ticket	7	7	24,775.00	2,479,611.00	1,834,880.00	74.0	123,251.00	5.0	521,480.00	21.0
TOTAL										
All Other										
Bingo	957	15,816	---	15,175,810.00	10,151,650.00	66.9	1,363,487.00	9.0	3,660,673.00	24.1
Casino	100	173	15,430.00	1,767,051.00	1,292,226.00	73.1	294,430.00	16.7	180,395.00	10.2
Raffle	2,228	4,830	3,350.00	7,549,979.00	3,358,765.00	44.5	820,005.00	10.9	3,371,209.00	44.6
Pull-Ticket	276	276	246,031.00	24,308,227.00	17,991,864.00	74.0	1,476,573.00	6.1	4,839,790.00	19.9
TOTAL										

TABLE 7

REGIONAL BREAKDOWN - % OF PROVINCIAL TOTAL
1983

Edmonton	1,103	18.9	9,541	22.7	264,958	21.8	83,108,748	34.0	60,157,328	34.0	7,861,824	36.5	15,089,596	32.6
Calgary	740	12.7	7,949	18.9	482,305	39.8	85,744,371	35.0	64,452,881	36.5	7,453,925	34.6	13,837,565	29.9
Ft. McMurray	82	1.4	440	1.0	18,235	1.5	3,873,603	1.6	2,787,474	1.6	357,783	1.6	728,346	1.6
Gr. Prairie	63	1.1	488	1.2	14,430	1.2	2,305,929	0.9	1,559,316	0.9	218,370	1.0	528,243	1.1
Lethbridge	104	1.8	1,048	2.5	84,395	7.0	9,840,200	4.0	7,248,014	4.1	769,282	3.6	1,822,904	3.9
Medicine Hat	91	1.6	895	2.1	50,592	4.2	6,317,312	2.6	4,556,593	2.6	507,081	2.4	1,253,638	2.7
Red Deer	82	1.4	590	1.4	32,425	2.7	4,570,374	1.9	3,119,882	1.8	405,879	1.9	1,044,613	2.2
All Other	3,561	61.1	21,095	50.2	264,811	21.8	48,801,067	20.0	32,794,505	18.5	3,954,495	18.4	12,052,067	26.0

TABLE 8

BINGO
REGIONAL BREAKDOWN 1983

Edmonton	398	25.9	7,838	24.2	---	---	27,613,210	50.9	19,071,433	50.3	3,060,598	56.5	5,481,179	50.1
Calgary	120	7.8	6,009	18.6	---	---	7,813,792	14.4	6,171,185	16.3	643,571	11.9	999,036	9.1
Ft. McMurray	6	0.4	279	0.9	---	---	1,009,844	1.9	725,945	1.9	111,098	2.1	172,801	1.6
Gr. Prairie	13	0.9	431	1.3	---	---	622,167	1.1	404,926	1.1	64,102	1.2	153,139	1.4
Lethbridge	20	1.3	877	2.7	---	---	823,795	1.5	567,536	1.5	56,711	1.0	199,548	1.8
Medicine Hat	11	0.7	676	2.1	---	---	547,433	1.0	393,940	1.0	51,411	0.9	102,082	0.9
Red Deer	11	0.7	419	1.3	---	---	704,497	1.3	454,394	1.2	64,082	1.2	186,021	1.7
All Other	957	62.3	15,816	48.9	---	---	15,175,810	27.9	10,151,650	26.7	1,363,487	25.2	3,660,573	33.4

TABLE 9

CASINOS
REGIONAL BREAKDOWN 1983

Edmonton	193	35.5	390	35.9	143,230	43.3	39,916,711	45.8	30,804,662	45.5	3,564,946	40.7	5,549,103	52.0
Calgary	187	34.4	381	35.1	142,100	43.0	41,233,183	47.3	32,486,057	47.9	4,213,022	48.1	4,534,104	42.5
Ft. McMurray	28	5.1	58	5.4	5,520	1.7	1,164,296	1.4	825,830	1.2	166,355	1.9	172,111	1.6
Gr. Prairie	5	0.9	10	0.9	1,420	0.4	196,044	0.2	133,966	0.2	37,847	0.4	26,231	0.3
Lethbridge	10	1.8	24	2.2	8,450	2.6	1,067,715	1.2	839,670	1.2	178,640	2.1	49,405	0.5
Medicine Hat	12	2.2	28	2.6	6,740	2.0	1,033,220	1.2	789,789	1.2	160,730	1.8	82,701	0.8
Red Deer	9	1.7	22	2.0	7,650	2.3	786,004	0.9	578,803	0.9	138,921	1.6	68,280	0.6
All Other	100	18.4	173	15.9	15,430	4.7	1,767,051	2.0	1,292,226	1.9	294,430	3.4	180,395	1.7

*For casinos, "gross" equals "drop" - the total of money spent to purchase chips

TABLE 10

PULL-TICKETS
REGIONAL BREAKDOWN 1983

Edmonton	21	4.5	21	4.5	114,128	13.3	11,603,853	13.5	8,662,040	13.6	719,024	13.9	2,222,789	12.9
Calgary	126	26.9	126	26.9	329,605	38.4	33,232,886	38.7	24,421,999	38.4	1,950,938	37.7	6,859,949	39.9
Ft. McMurray	5	1.1	5	1.1	12,715	1.5	1,269,480	1.5	969,660	1.5	63,676	1.2	236,144	1.4
Gr. Prairie	5	1.1	5	1.1	12,510	1.4	1,247,347	1.4	913,860	1.4	82,220	1.6	251,267	1.5
Lethbridge	18	3.8	18	3.8	75,495	8.8	7,554,875	8.8	5,650,040	8.9	491,530	9.5	1,413,305	8.2
Medicine Hat	11	2.3	11	2.3	43,002	5.0	4,260,801	4.9	3,151,480	5.0	262,687	5.1	846,634	4.9
Red Deer	7	1.5	7	1.5	24,775	2.9	2,479,611	2.9	1,834,880	2.9	123,251	2.4	521,480	3.0
All Other	276	58.8	276	58.8	246,031	28.7	24,308,227	28.3	17,991,864	28.3	1,476,573	28.6	4,839,790	28.2

TABLE 11

RAFFLES
REGIONAL BREAKDOWN 1983

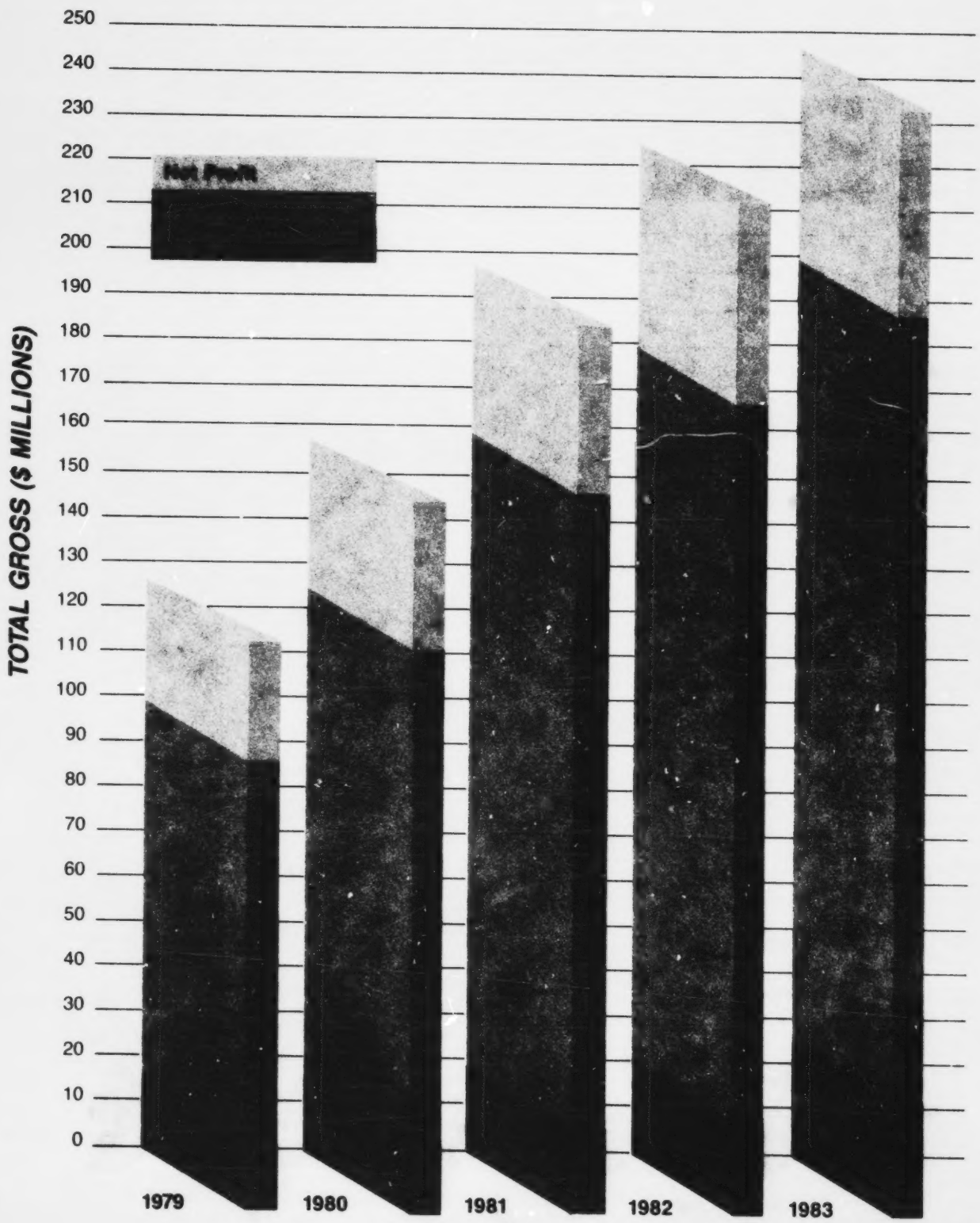
Edmonton	491	15.0	1,292	15.9	7,600	32.6	3,972,974	23.2	1,619,193	21.9	517,256	23.6	1,836,525	24.3
Calgary	307	9.4	1,433	17.6	10,600	45.4	3,464,510	20.2	1,373,640	18.6	646,394	29.5	1,444,476	19.1
Ft. McMurray	43	1.3	98	1.2	—	0.0	429,983	2.5	266,039	3.6	16,654	0.8	147,290	2.0
Gr. Prairie	40	1.2	42	0.5	500	2.1	238,371	1.4	106,564	1.4	34,201	1.6	97,606	1.3
Lethbridge	56	1.7	129	1.6	450	1.9	393,815	2.3	190,768	2.6	42,401	1.9	160,646	2.1
Medicine Hat	57	1.7	180	2.2	850	3.6	475,858	2.8	221,384	3.0	32,253	1.5	222,221	2.9
Red Deer	55	1.7	142	1.7	—	0.0	600,262	3.5	251,805	3.4	79,625	3.6	268,832	3.6
All Other	2,228	68.0	4,830	59.3	3,350	14.4	7,549,979	44.1	3,358,765	45.5	820,005	37.5	3,371,209	44.7

* For agricultural fairs and exhibition boards only

GRAPH 1

All Licenced Gaming

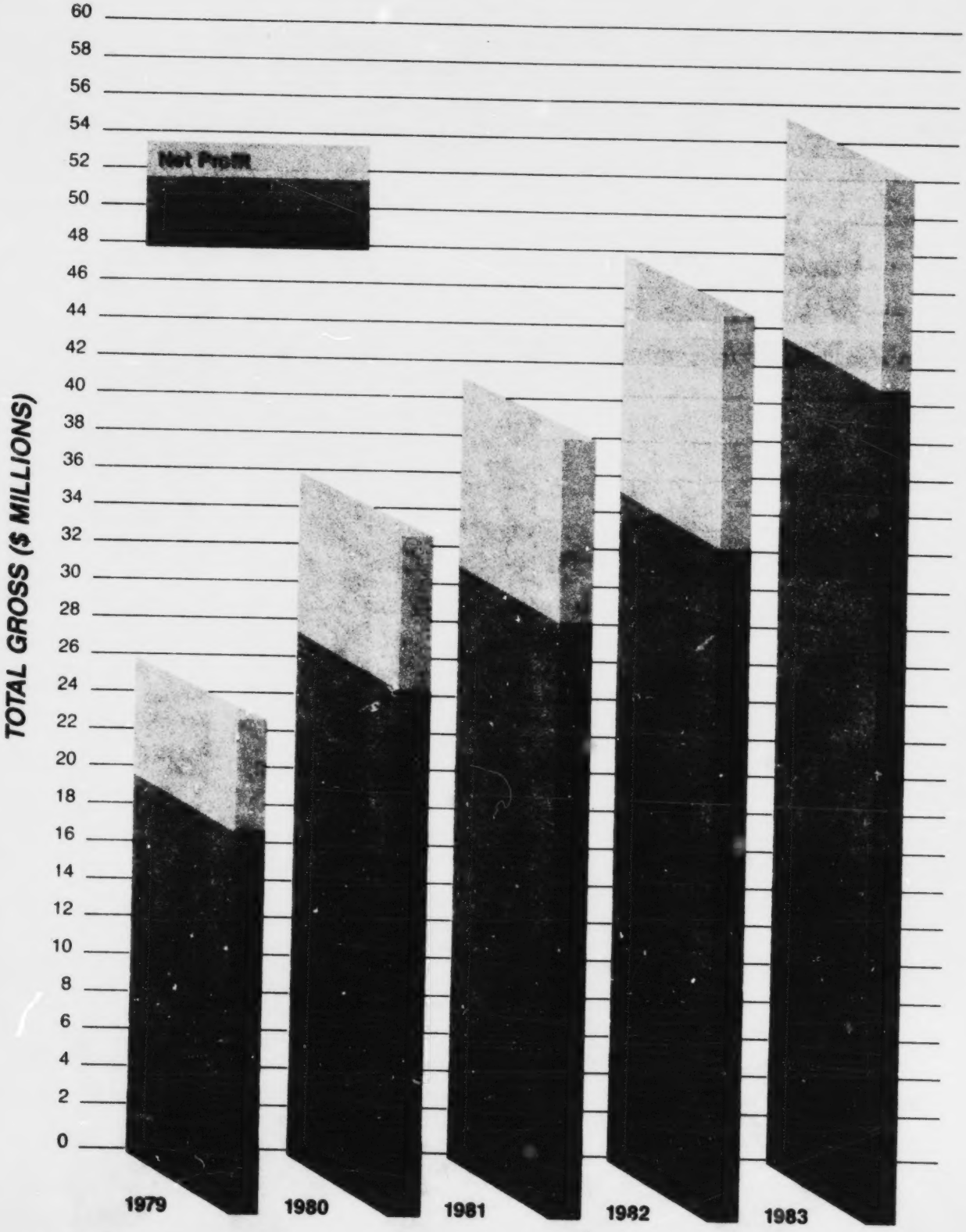
1979-1983



GRAPH 2

Bingo

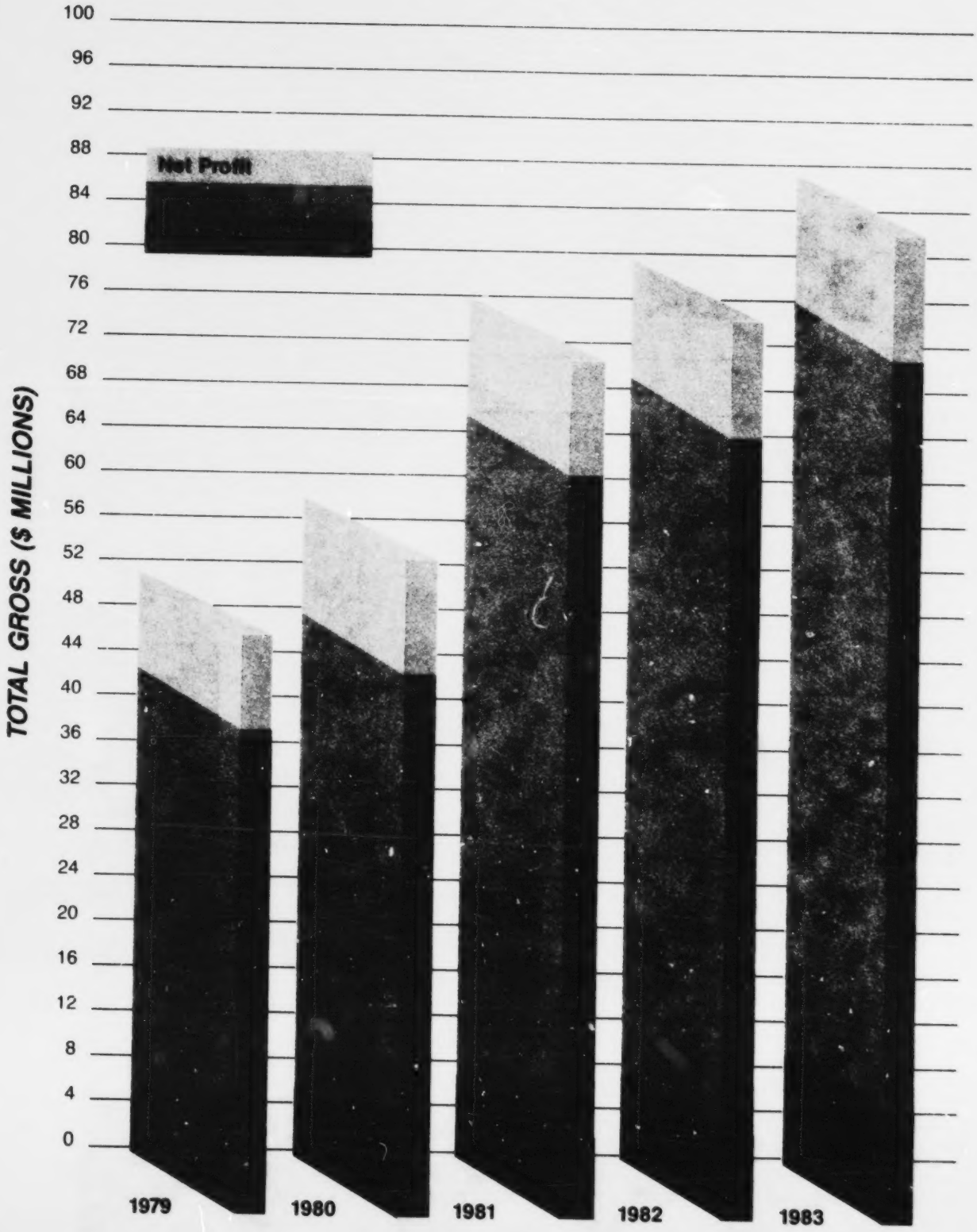
1979-1983



GRAPH 3

Casinos

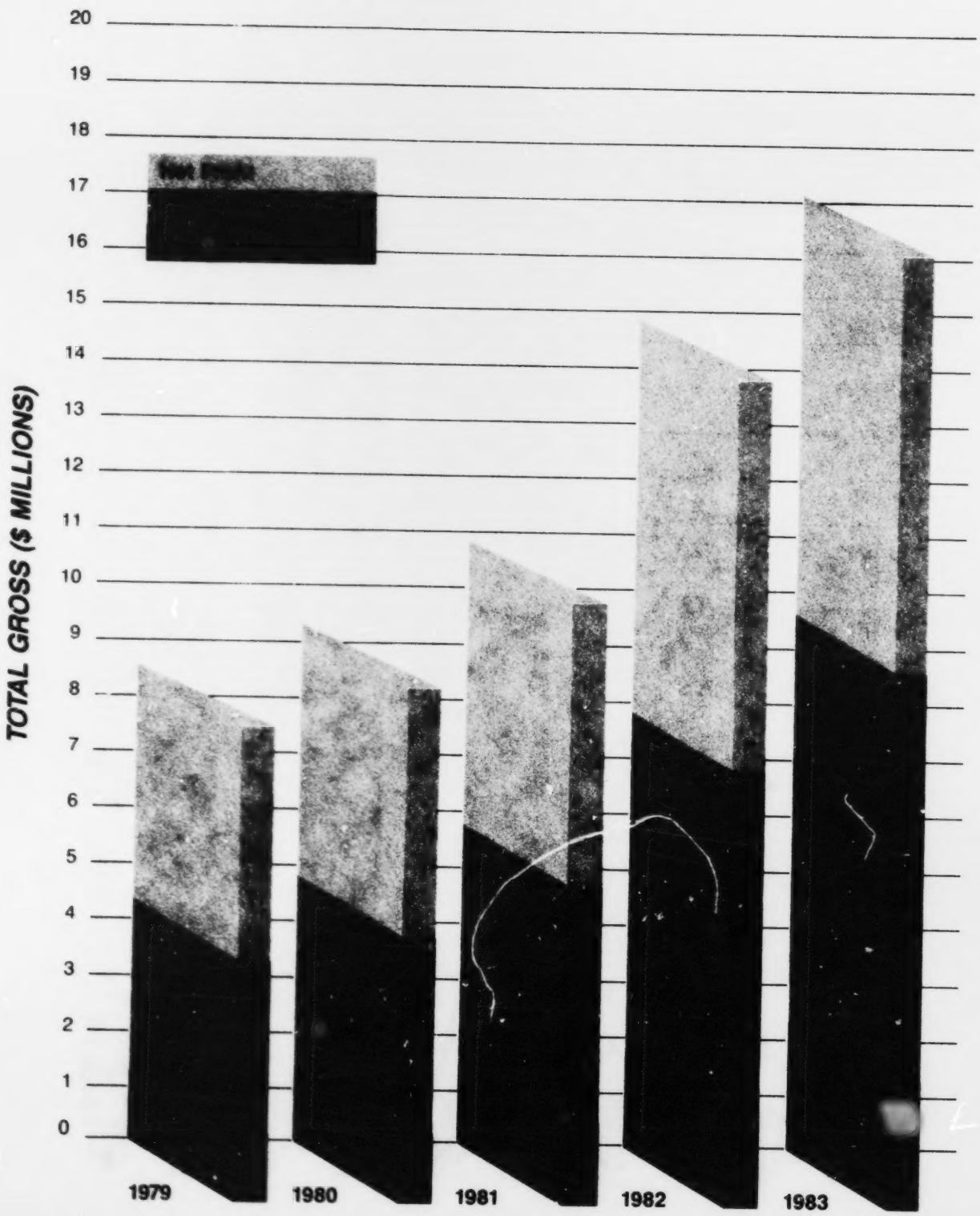
1979-1983



GRAPH 4

Raffles

1979-1983



GRAPH 5

Pull-Tickets

1979-1983